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ATTORNEYS FOR DEFENDANT MA LABORATORIES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MICHELLE LOU, MARSHA BEER, SIMON
NIM, AND JESUAN RUIZ RODRIGUEZ,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

MA LABORATORIES, INC., ABRAHAM
MA, CHRISTINE RAO, CHRISTY YEE,

Defendants.

CASE NO. C 12 5409 WHA

REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF DEFENDANTS' RESPONSE
REGARDING *ORTIZ V. FIBREBOARD*
CORP PURSUANT TO DECEMBER 26,
2013 ORDER

Pursuant to Federal Rule of Evidence 201, Defendants request that the Court take judicial
notice of the following:

1. The original complaint in *Tian v. Ma Laboratories, Inc.*, Superior Court of California,
County of Santa Clara, Case No. 1-11-CV-195373, filed on or about March 1, 2011, a
true and correct copy of which is attached hereto as **Exhibit A**;

2. The First Amended Complaint filed in *Tian v. Ma Laboratories, Inc.*, Superior Court of California, County of Santa Clara, Case No. 1-11-CV-195373, filed on or about October 27, 2011, a true and correct copy of which is attached hereto as **Exhibit B**;
3. The Order Granting Plaintiffs' Motion for Leave to File Second Amended Complaint entered on or about July 8, 2013 by Judge Kleinberg in the matter of *Tian v. Ma Laboratories, Inc.*, Superior Court of California, County of Santa Clara, Case No. 1-11-CV-195373, Docket No. 0117-000, a true and correct copy of which is attached hereto as **Exhibit C**;
4. The Second Amended Complaint filed in *Tian v. Ma Laboratories, Inc. et al.*, Superior Court of California, County of Santa Clara, Case No. 1-11-CV-195373, filed on or about July 9, 2013, a true and correct copy of which is attached hereto as **Exhibit D**;
5. The First Amended Complaint filed in the instant matter, *Lou v. Ma Laboratories, Inc. et al.*, Case No. 12-5409-WHA, filed on or about July 11, 2013, a true and correct copy of which is attached hereto as **Exhibit E**; and
6. A summary of the voluminous facts and claims contained in the First Amended Complaint filed in *Lou v. Ma Laboratories, Inc.*, and comparison with those contained in the Second Amended Complaint in *Tian v. Ma Laboratories, Inc., et al.*, which reveals the overlapping claims, a true and correct copy of which is attached hereto as **Exhibit F**.

DATED: DECEMBER 31, 2013

BERLINER COHEN

BY: /s/ CHRISTINE H. LONG

CHRISTINE H. LONG

SUSAN E. BISHOP

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CHRISTINE RAO, AND CHRISTY YEE

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